Environmental Footprint methods & contribution to the fight against greenwashing

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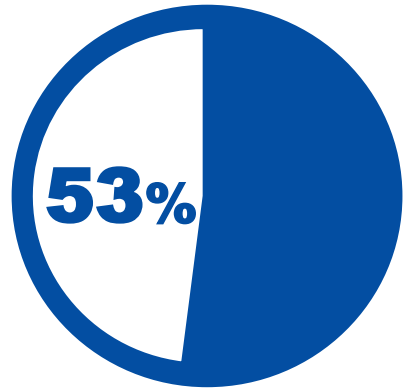**European Commission, DG Environment**

Environmental claims and greenwashing

The Green Great Maze – survey by BEUC
*48% of consumers prefer buying a product **with a green label** than products without one*
*40% are even willing to **pay more** for a product or service **with a verified green claim/ label***

2020 inventory on sustainability claims

53% claims provide **vague, misleading or unfounded** environmental information on the product
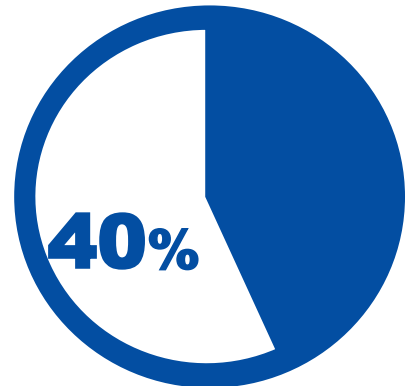
40% of claims are **unsubstantiated**

2020 sweep on misleading sustainability claims

- Others 15%
- Textile / Garment / Shoes 24%
- Cosmetics / Personal care goods 17%
- Travel Services 4%
- Vehicles 3%
- Energy services 6%
- Household equipment 14%
- Electronic goods 5%
- Food products 12%

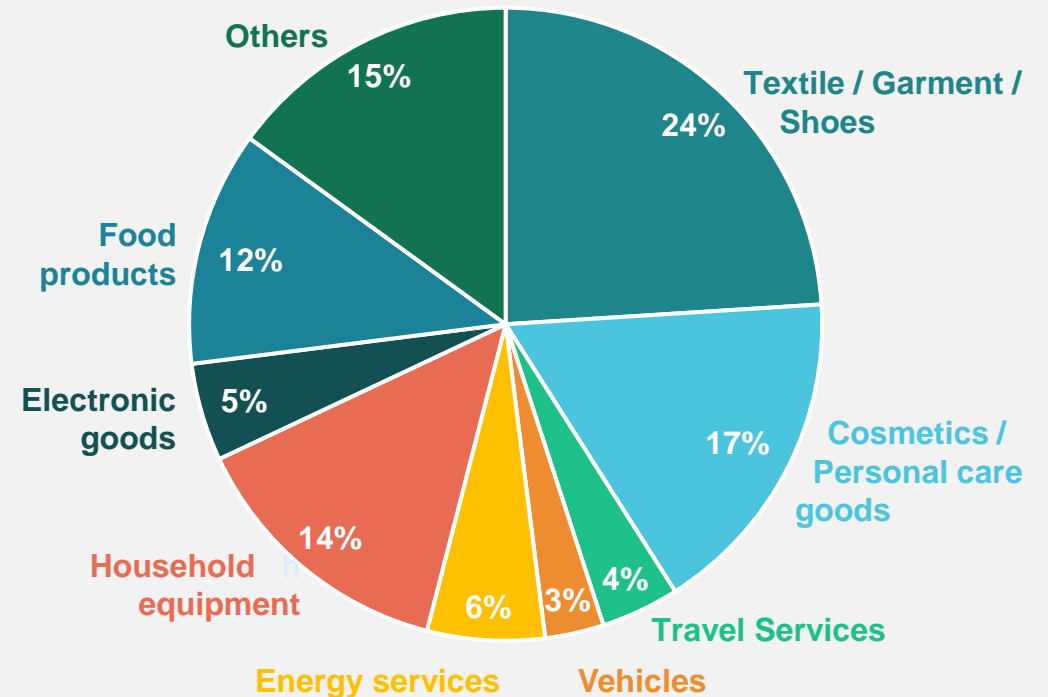# Unfair Commercial Practices Directive – amended by Empowering Consumers for the Green Transition

► **New rules:**

Generic sustainability claims not allowed

e.g. *'sustainable' , 'ecological', 'climate neutral'*

unless *recognised excellent environmental performance*

→ *EU Ecolabel*

→ *ISO type I scheme recognised in Member State*

All sustainability labels **to be based on certification schemes**

→ *No self-certification*

Green Claims Directive proposal

For business-to-consumer environmental **specific** **claims and labels**:

- **Science-based substantiation** (widely-recognized scientific evidence, LCA/EF, significance of impacts, trade-offs)

- **Transparent communication**

- **Avoid proliferation of labelling schemes & reinforce trust** in existing ones (EU Ecolabel outside of the scope of GCD)

- **Ex-ante verification by independent & accredited verifiers**

Support to SMEs and exemption for microenterprises from substantiation requirements on claims unless they chose to opt-in

Trialogue for GCD to start early 2025

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LCA harmonization need

Resources → [Packaging & Distribution, Use & Maintenance, Disposal, Recycling & Recovery, Natural Resources & Raw Material Extraction, Processing, Manufacturing] → Emissions, Waste

LCA, as standardised by ISO, as powerful tool but not directly suitable for some applications

Same product **Different results**

- impact assessment methods
- modelling (e.g. system boundaries, allocation, end of life)
- data
- interpretation

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Environmental Footprint (EF) methods

Providing harmonised rules and data to make LCA of products (PEF) and organisations (OEF) more robust and fit-for-policies

1. **Communication of the environmental footprint (*)**

2. **Development, implementation and evaluation of policies and initiatives**

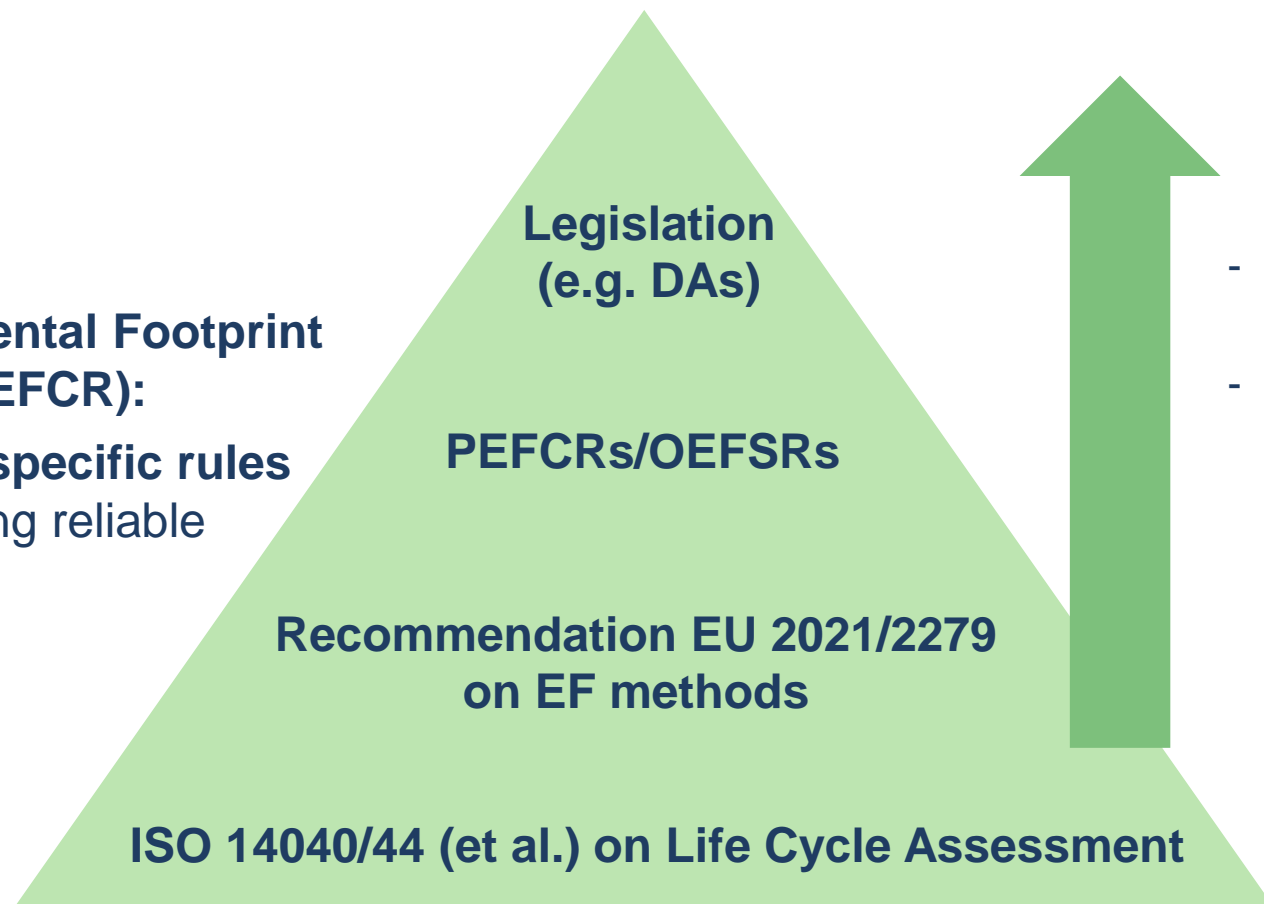3. **Analysis and reduction of environmental impacts of products and organizations**

(*) European Green Deal – 12/2019: Reliable, comparable and verifiable information also plays an important part in enabling buyers to make more sustainable decisions and reduces the risk of 'green washing'

(*) Circular Economy Action Plan – 3/2020: The Commission will propose that companies substantiate their environmental claims using Product and Organisation Environmental Footprint methods

EF methods in the LCA & EU policy context

Product Environmental Footprint Category Rules (PEFCR):
Industry-endorsed, **specific rules per sectors**, enabling reliable comparisons

Legislation
(e.g. DAs)

PEFCRs/OEFSRs

Recommendation EU 2021/2279
on EF methods

ISO 14040/44 (et al.) on Life Cycle Assessment

- *Each layer aims to build on the one below*

- *Going up, further methodological and data specifications leave less space for own assumptions and enhance reliability, comparability and verifiability*

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Added value
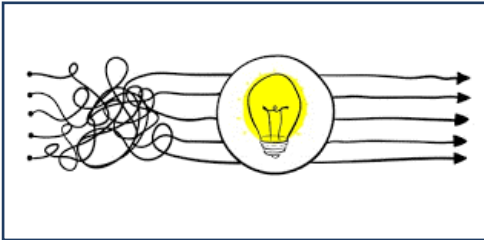
Harmonise assumptions and support implementation, esp. SMEs

Promote reliability against greenwashing

Allow a level playing field for companies

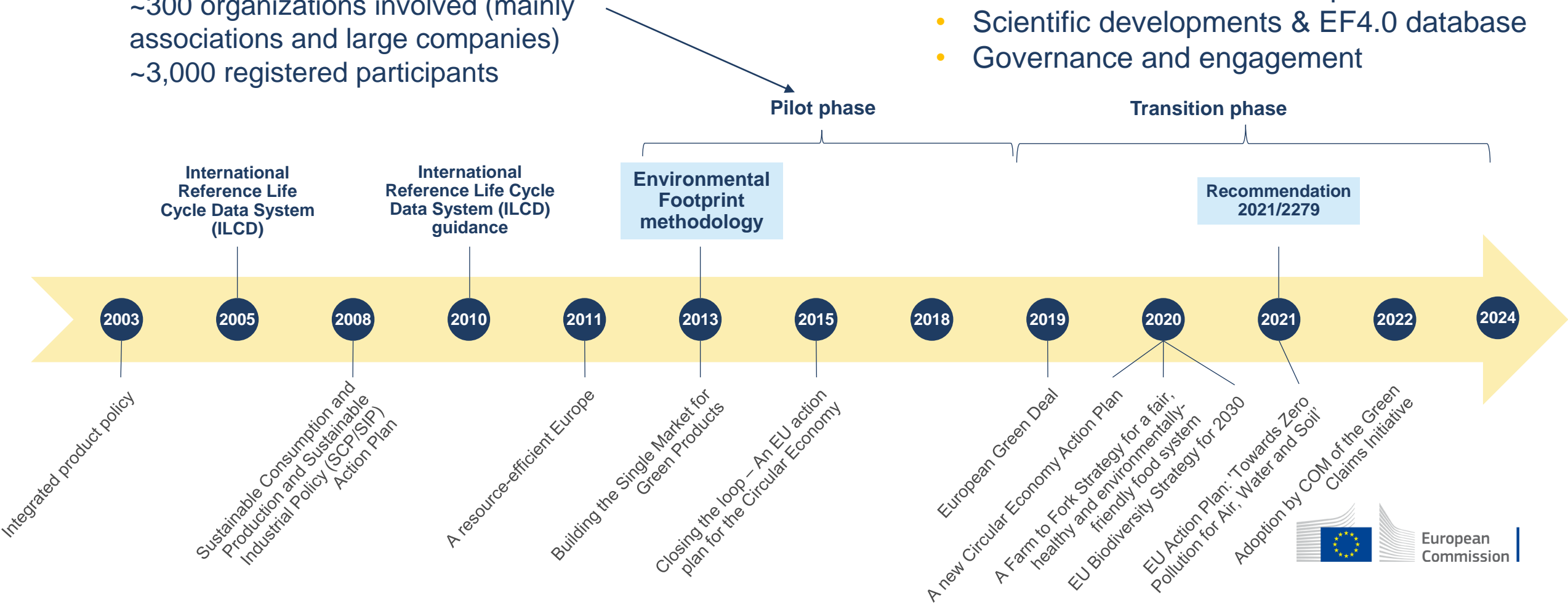Ensure credibility through transparency, verification and engagement

The EF journey

21 PEFCR/OEFSRs
~300 organizations involved (mainly associations and large companies)
~3,000 registered participants

Developments:
- Progress / finalisation of PEFCR/OEFSRs
- Monitor and mainstream implementation
- Scientific developments & EF4.0 database
- Governance and engagement

Pilot phase

Transition phase

International Reference Life Cycle Data System (ILCD)

International Reference Life Cycle Data System (ILCD) guidance

Environmental Footprint methodology

Recommendation 2021/2279

2003 · **2005** · **2008** · **2010** · **2011** · **2013** · **2015** · **2018** · **2019** · **2020** · **2021** · **2022** · **2024**

Integrated product policy

Sustainable Consumption and Production and Sustainable Industrial Policy (SCP/SIP) Action Plan

A resource-efficient Europe

Building the Single Market for Green Products

Closing the loop – An EU action plan for the Circular Economy

European Green Deal

A new Circular Economy Action Plan

A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system

EU Biodiversity Strategy for 2030

EU Action Plan: 'Towards Zero Pollution for Air, Water and Soil'

Adoption by COM of the Green Claims Initiative

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New PEFCRs expected for 2024-2025
1. Aquaculture and marine fish
2. Apparel& Footwear (linked to ESPR)
3. **Cut Flowers and potted plants**
4. **Synthetic turf**

Updates expected for 2024-2025
5. Batteries and accumulators
6. Beer
7. **Copper (OEFSR)**
8. Dairy products
9. Feed for food-producing animals
10. Pasta
11. Pet food

Other PEFCRs:
12. Aircrafts, drones and VTOL (EASA), 2024-2025
13. Space (DEFIS), 2026
14. Tourism (GROW), 2025

"Shadow" PEFCRs:
- Developed by industry independently from EC
- Not to formally follow all EF procedures/rules (adaptations possile)
- Could be reference for further developments, incl. EF processes and policy uses
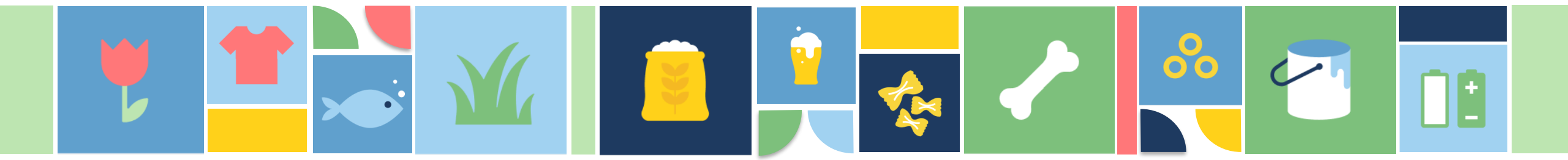
Increasing use of LCA / EF in EU policies

- **Also applications in countries (e.g. IT and FR)**
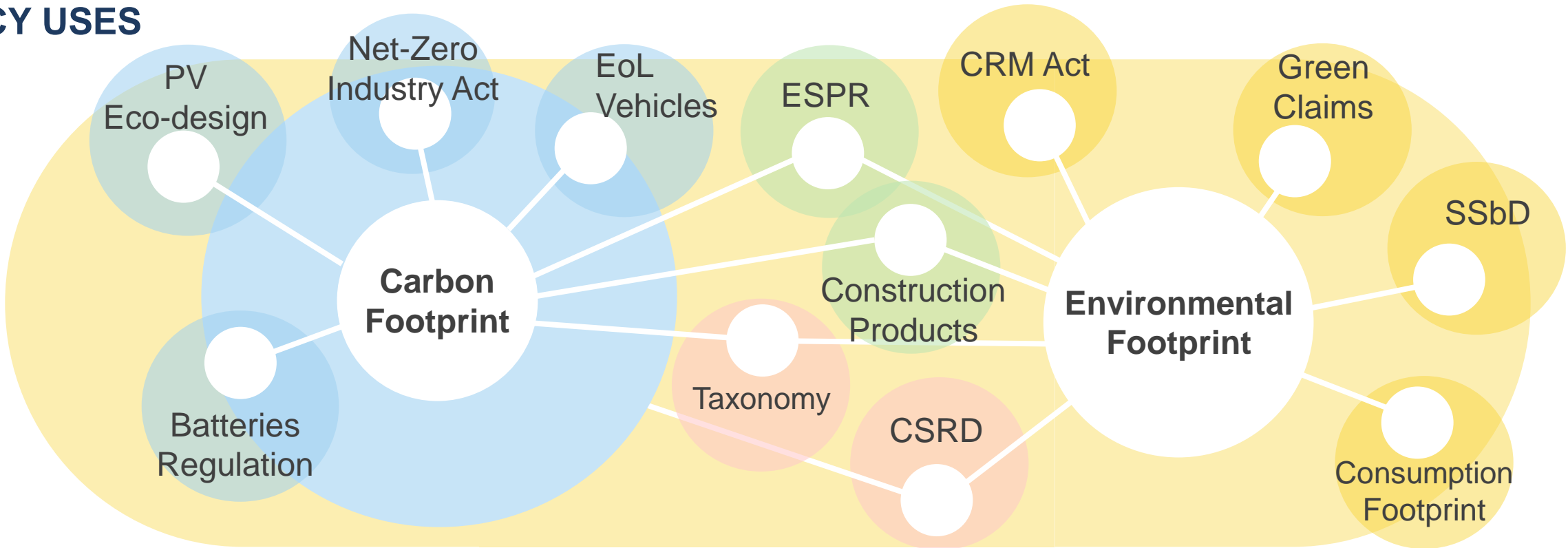- **Policy coherence and harmonisation of methods!**

EU GREEN DEAL
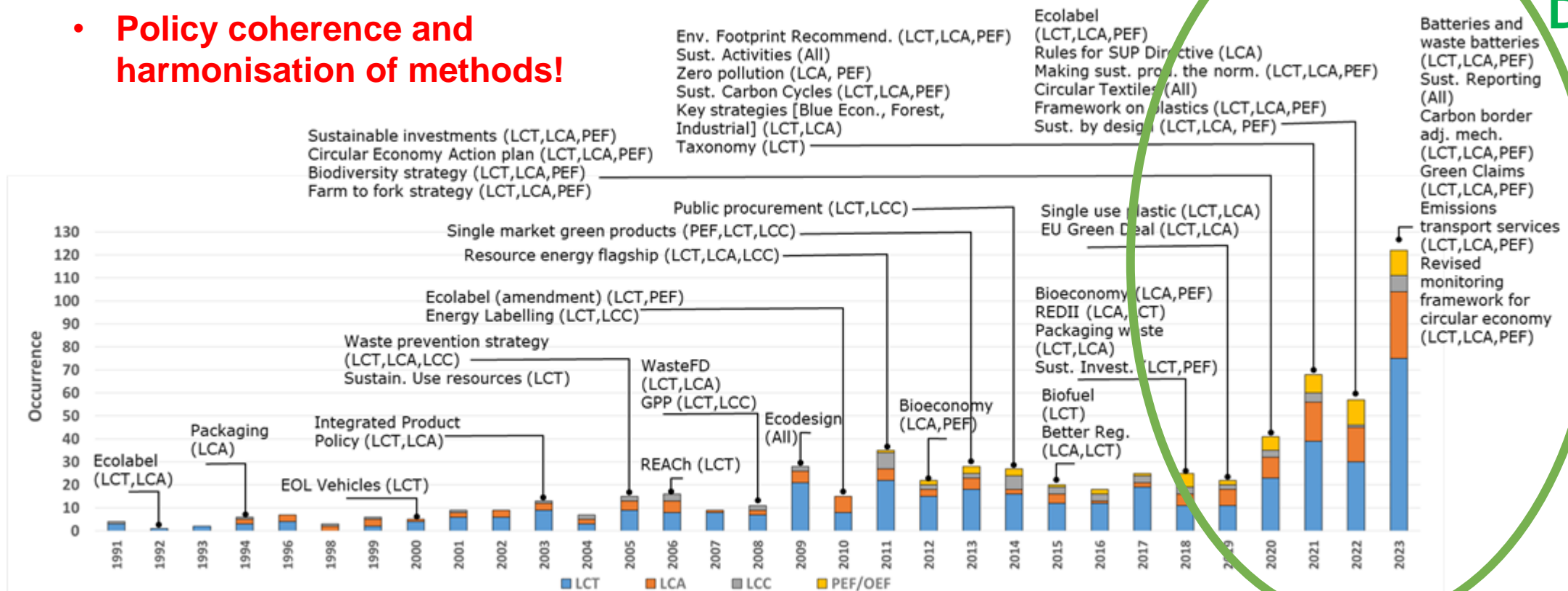
Updated from Sala et al. (2021). The evolution of life cycle assessment in European policies over three decades. *The International Journal of Life Cycle Assessment*, 26, 2295-2314.

POLICY DEVELOPMENT

ANTICIPATION & PROBLEM DEFINITION → FORMULATION → IMPACT ASSESSMENT → IMPLEMENTATION → EVALUATION

POLICY USES

PV Eco-design

Net-Zero Industry Act

EoL Vehicles

ESPR

CRM Act

Green Claims

SSbD

Carbon Footprint

Construction Products

Environmental Footprint

Batteries Regulation

Taxonomy

CSRD

Consumption Footprint

Strategic priorities for the future of EF methods

Transition period to be closed by 2025:

- Methodological developments to fulfill policy needs (e.g. GCD)

- Pursue harmonization (e.g. carbon footprint)

- Streamline the implementation (e.g. text, rules, data)

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Outlook for EF methods

- Planned review of EF Recommendation in 2025 (text, PEFCR/OEFSR-related procedures, methods)

- New EF4.0 database (2026-2027)

- Review of governance (e.g. update of EF TAB via [Register of Commission expert groups](#))

- Training and communication

- Finalisation of PEFCRs and WP for future years

- Support to application of EF methods across EU polices (e.g. GCD/ESPR)
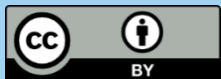
THANK YOU!

ENV website: [Environmental Footprint methods](#)

JRC website: [European Platform on LCA (EPLCA)](#)

EF TAB: [Register of Commission expert groups](#)

Circular economy: [Circular economy](#)

Green claims: [Green claims](#)